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Before the
Federal Communications Commission
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)	MB Docket No. 04-191
)	
San Francisco Unified School District)	
)	
For Renewal of License for Station KALW(FM),)	Facility ID No. 58830
San Francisco, California)	File No. BRED-19970801YA

To: The Secretary

Attn: Chief Administrative Law Judge
Richard L. Sippel

**ENFORCEMENT BUREAU'S MOTION TO INSERT PAGE INTO ITS
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

On October 14, 2005, the Enforcement Bureau (the "Bureau") filed its Proposed Findings of Fact and Conclusions of Law ("PFCs") in this proceeding. Although all the PFCs' pages were included in the electronic copies sent to the Presiding Administrative Law Judge ("Presiding ALJ") and to counsel for the San Francisco Unified School District ("SFUSD"), it appears that the paper copies that were submitted to the Secretary, to the Presiding ALJ, and to counsel for SFUSD, inadvertently did not include page 55. Accordingly, the Bureau requests that the attached page 55 be inserted into its PFCs.

Respectfully submitted,



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ownership reports up to date, which were enclosed in the memorandum she mailed to Mr. Sanchez.²⁵⁵ Ms. Sawaya also testified that she and others were involved “in the process” of completing the PIF, by which she meant that quarterly issues/program lists were being created.²⁵⁶

85. An e-mail from Mr. Sanchez to Ms. Jenkins dated March 6, 2001, reports that:

Nicole and Bill called today to review their work on the FCC’s questions. They will be sending draft answers by the end of the week. They are pleased we are asking the 30 day extension.²⁵⁷

Billing records from the Sanchez Law Firm confirm that: Mr. Sanchez, Mr. Helgeson, and Ms. Sawaya had a conference “re work on responses to recent letter from the FCC mass media bureau [sic]; review request for extension of time to Commission.”²⁵⁸ On March 15, billing records from the Sanchez Law Firm reflect that Ms. Jenkins “[r]eviewed memo and attachment from Ms. Sawaya and Mr. Helgeson for response to FCC re public file,” and that, on the following day, she and Ms. Sawaya had a 15 minute telephone conference.²⁵⁹ On April 2, Ms. Jenkins billed SFUSD 10 hours for “[w]ork on response to FCC letter, including numerous telephone conversations with Mr. Helgeson and Ms. Sawaya.”²⁶⁰ And on April 5, the day before SFUSD filed its Final LOI Response, Mr. Sanchez billed SFUSD for five and one half hours, which included

²⁵⁵ Tr. 1346.

²⁵⁶ Tr. 1361.

²⁵⁷ EB Ex. 17.

²⁵⁸ EB Ex. 35, p. 1.

²⁵⁹ *Id.*

²⁶⁰ *Id.*, p. 2.

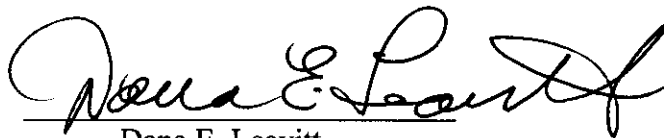
CERTIFICATE OF SERVICE

Dana E. Leavitt, Special Counsel in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has, on this 20th day of October, 2005, sent by first class United States mail, electronic mail (e-mail) and/or delivered by hand, copies of the foregoing "Enforcement Bureau's Motion to Insert Page into its Proposed Findings of Fact and Conclusions of Law" to:

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